

Commonwealth of Kentucky
Division for Air Quality

PERMIT STATEMENT OF BASIS

Federally Enforceable Conditional Major
U.S. Smokeless Tobacco Manufacturing Limited Partnership
Hopkinsville, Kentucky.
June 16, 2004
Esmail Hassanpour, Reviewer
Plant I.D. # 21-047-00055
Application Log # 56290
Permit #: F-01-030 R2

DESCRIPTION:

REVISION 1

U.S. Smokeless Tobacco Manufacturing, Limited Partnership proposes a significant revision to their conditional major permit number F-01-030 issued to the facility in Hopkinsville, Kentucky. The source plans to add two fluidized-bed dryers to its processing lines. The new dryers will have higher hourly and annual emissions than the existing. The source is taking self-imposed limits to preclude the applicability of Title V requirements

MINOR PERMIT REVISION FOR INCREASE USAGE OF FUMIGANT- REVISION 2

U.S. Smokeless Tobacco Manufacturing Limited Partnership applied to the Division for Air Quality in January 28, 2004 to add three laboratory fume hoods for physical/chemical analyses and increase usage of Phosphide Fumigant for insect control in tobacco warehouses. The source proposes an increase in the usage rate of pesticide from 795 to 1590 pounds per year for insect control in the three tobacco warehouses. The current fumigant contains 55 percent aluminum phosphide however, the source request alternative use of pesticide which contains 56 percent magnesium phosphide. The source projects emission of 0.333 pound phosphine gas per pound of solid pesticide used for either aluminum or magnesium phosphide. Current permit usage rate is 265 pounds pesticide per warehouse application, and 88.3 pound of phosphine gas per warehouse in a year. The hours of operation and the pesticide fogging solution will not change from the existing permitted level (See emission/operating cap description). The three laboratory fume hoods for chemical and physical analyses have been added to the insignificant list, and there are no emissions from these fume hoods. Screen 3 analyses done on total phosphate gas shows that it's below the preliminary remediation goal (PRG) limits (See attachment).

REGULATION APPLICABILITY:

401 KAR 59:015, New Indirect Heat Exchangers.
401 KAR 59:010, New Process Operations.
401 KAR 63:020, Potentially hazardous matter or toxic substance

Statement of basis:

COMMENTS:

Source wide emissions for Particulate Matter, (PM) and Volatile Organic Compounds (VOC)

shall not exceed the respective limitations specified in the permit.

Compliance with annual emissions and processing limitations imposed pursuant to Section 1b of the material incorporated by reference in 401 KAR 52:030, Section 26, and contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

In accordance with Regulation 401 KAR 52:030, Section 10, incorporating the standard requirements reference material Section 1b, source wide emissions for Particulate Matter (PM) and Volatile Organic Compounds (VOC)] shall not equal or exceed 89.9 tons per year on a consecutive twelve (12) month total.

Generator operations shall not equal or exceed the agreed limitation of 500 hr/yr.

The permittee shall adhere to the potential emissions limitations specified in the permit.

EMISSIONS AND OPERATING CAP DESCRIPTION:

The source has the potential to be a major source for PM, NO_x and VOC emissions. However, the source has requested to be classified as a conditional major source with a federally enforceable limit not to equal or exceed 100 tons per year. The source is limiting generator operations to 500 hours per year. In addition, the source is limiting the leaf operations and drying operations (source units 101, 102, 103, 201 and 202) to 4650 hours per year. The indirect heat exchangers will run for 8760 hours per year, and the application of pesticide fogging solution will not exceed 1440 gallons/year and 576 hours/year. This will limit the potential emissions source-wide for PM and VOC below 90 tons per year, to preclude the applicability of Title V requirements. Also, the permittee is limiting emissions from individual hazardous air pollutants (HAPs), to less than nine (9) tons per year. The operation and the application of phosphine fumigant shall not exceed 795 pounds/year and 288 hour/year respectively.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record-keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.